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REMARKS

In response to the Office Action mailed on September 30, 2005, Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. Applicant respectfully submits that the claims as presented are in condition for allowance.

Claims 1, 15, and 25 have been amended, leaving claims 1-25 for consideration upon entry of the present amendment. The paragraph [0027] at page 9 or the paragraph [0032] at page 11 of the specification shows the features of amended claims 1, 15, and 25. No new matter has been added by the amendments.

Claim Rejections Under 35 U.S.C. § 102

Claims 1, 7-8, 10-11, 15, 17, 19, 21, and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Brouwer et al., U.S. 2005/0057425A1 (hereinafter "Brouwer"). Applicant respectfully traverses the rejections because Brouwer fails to disclose or teach all of the elements of independent claims 1, 15, and 25, respectively.

To anticipate a claim under 35 U.S.C. § 102, a single source must contain all of the elements of the claim. *Lewmar Marine Inc. v. Bartlett, Inc.*, 827 F.2d 744, 747, 3 U.S.P.Q.2d 1766, 1768 (Fed. Cir. 1987), *cert. denied*, 484 U.S. 1007 (1988).

Claim 1, as amended, recites "A method for providing a regional E911 network, said method comprising: assigning public safety answering points (PSAPs) to ports located in a telephone network, wherein each said port is associated with a calling party number (CPN) and a geographic location; identifying an incoming emergency call from an IP device, said IP device corresponding to a unique machine access code address and said incoming emergency call including an incoming CPN; determining which said port is an entry port associated with said IP device, wherein input to said determining includes said unique machine access code address and said incoming CPN; connecting said incoming emergency call to one of said PSAPs corresponding to said entry port; transmitting said CPN and said geographic location data to one of said PSAPs corresponding to said entry port; and mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device." (Emphasis added.)

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In contrast, Brouwer fails to teach or suggest at least the element "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in independent claim 1. Therefore, Brouwer neither anticipates nor renders claim 1 obvious. Independent claims 15 and 25 contain similar features as claim 1, they are considered patentable over Brouwer for at least the reasons given for claim 1. Claims 7-8 and 10-11 depend from claim 1, and claims 17, 19, and 21 depend from claim 15. These dependent claims are believed to be allowable at least due to their dependency.

Rejections of Claims 2 and 16 Under 35 U.S.C. § 103(a)

With regard to claims 2 and 16, these claims stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Clise et al., U.S. Patent No. 6,064,722 (hereinafter "Clise"). Applicant respectfully traverses the rejections because Brouwer in view of Clise does not teach or suggest all of the elements in claims 2 and 16.

For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art; that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references; and that the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970).

Clise fails to teach or suggest the element "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 1, from which claim 2 depends. Therefore, Clise does not cure the deficiency of Brouwer. Because neither Brouwer nor Clise alone or in combination teach or suggest the element "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 1, Brouwer in view of Clise does not render claim 1 obvious.

Claim 2 depends from claim 1, and thus is believed to be allowable at least due to its dependency. Since it contains similar features, claim 15 is believed to be patentable over

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Brouwer in view of Clise for at least the reasons given for claim 1. Claim 16 depends from claim 15, and this is believed to be allowable at least due to its dependency.

Rejections of Claims 3-6 Under 35 U.S.C. § 103(a)

Claims 3-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Clise, and further in view of Aprile, U.S. Patent No. 6,363,138 (hereinafter "Aprile"). Applicant respectfully traverses the rejections because Brouwer in view of Clise, and further in view of Aprile does not teach or suggest all of the elements in claims 3-6.

According to exemplary embodiments, mapping a physical location and address to an IP address and port occurs as the circuits are turned up. In contrast, Col. 3, lines 32-48 of Aprile teaches that the ALI information manager 20,..., is configured to automatically update the ALI database which is stored in the ALI information manager 20 when moves, adds or changes are performed with respect to the PBX's 30. Therefore, Aprile fails to teach or suggest the element "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 1, from which claims 3-6 depend.

Thus, Brouwer in view of Clise, and further in view of Aprile does not render claim 1 obvious, because it fails to teach or suggest all of the elements of claim 1. Claims 3-6 are believed to be allowable at least due to their dependency.

Rejections of Claims 9 and 12 Under 35 U.S.C. § 103(a)

Claims 9 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Horton et al., U.S. Patent No. 6,041,222 (hereinafter "Horton"). Applicant respectfully traverses the rejections because Brouwer in view of Horton does not teach or suggest all of the elements in claims 9 and 12.

Horton fails to teach or suggest the element "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 1, from which claims 9 and 12 depend. Therefore, Brouwer in view of Horton does not render claim 1 obvious, because it fails to teach or suggest all of the elements of claim 1. Claims 9 and 12 are believed to be allowable at least due to their dependency.

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Rejections of Claims 20 and 22 Under 35 U.S.C. § 103(a)

Claims 20 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Zellner et al., U.S. Patent No. 6,807,564 (hereinafter "Zellner"). Applicant respectfully traverses the rejections because Brouwer in view of Zellner does not teach or suggest all of the elements in claims 20 and 22.

Zellner fails to teach or suggest "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 15, from which claims 20 and 22 depend. Therefore, Brouwer in view of Zellner does not render claim 15 obvious, because it fails to teach or suggest all of the elements of claim 15. Claims 20 and 22 are believed to be allowable at least due to their dependency.

Rejections of Claims 13-14 Under 35 U.S.C. § 103(a)

Claims 13-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Salvucci et al., U.S. Patent No. 6,775,356 (hereinafter "Salvucci"). Applicant respectfully traverses the rejections because Brouwer in view of Salvucci does not teach or suggest all of the elements in claims 13-14.

Salvucci fails to teach or suggest "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 1, from which claims 13 and 14 ultimately depend. Therefore, Brouwer in view of Salvucci does not render claim 1 obvious, because it fails to teach or suggest all of the elements of claim 1. Claims 13 and 14 are believed to be allowable at least due to their dependency.

Further, claims 13 and 14 are considered allowable for additional reasons. Col. 4, lines 36-38 of Salvucci teaches the Emergency Service Number (ESN) which is a three digit code that can represent a geopolitical jurisdiction. Because the ESN is 911, the three digit code will be the three digit representing the area code of each state. Salvucci however, fails to teach or suggest fields any other than the state field. Salvucci further fails to teach or suggest identifying each field as digits. Therefore, Salvucci does not teach or suggest the elements "said geodetic data includes a geo-location code including a country field, a state field, a county field, a mile field, an acre field, a sector field and a floor field" and "said country field is three digits, said state

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field is three digits, said county field is three digits, said mile field is four digits, said acre field is three digits, said sector field is one digit and said floor field is three digits", as recited in claims 13 and 14, respectively.

For at least the reasons stated above, Brouwer in view of Salvucci does not render claims 13 and 14 obvious.

Rejections of Claim 18 Under 35 U.S.C. § 103(a)

Claim 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Cruickshank, U.S. Patent No. 6,704,294 (hereinafter "Cruickshank"). Applicant respectfully traverses the rejections because Brouwer in view of Cruickshank does not teach or suggest all of the elements in claim 18.

Cruickshank fails to teach or suggest "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 15, from which claim 18 depends. Therefore, Brouwer in view of Cruickshank does not render claim 15 obvious, because it fails to teach or suggest all of the elements of claim 15. Claim 18 is believed to be allowable at least due to its dependency.

Rejections of Claims 23-24 Under 35 U.S.C. § 103(a)

Claims 23-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Brouwer in view of Contractor et al., U.S. Patent No. 6,427,001 (hereinafter "Contractor"). Applicant respectfully traverses the rejections because Brouwer in view of Contractor does not teach or suggest all of the elements in claims 23-24.

Contractor fails to teach or suggest "mapping a physical location and address to said IP device and said entry port, in response to a moving of said IP device", as recited in claim 15, from which claims 23-24 depend. Therefore, Brouwer in view of Contractor does not render claim 15 obvious, because it fails to teach or suggest all of the elements of claim 15. Claims 23-24 are believed to be allowable at least due to their dependency.

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Conclusion

In view of the foregoing remarks and amendments, Applicant submits that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130 maintained by Applicants' attorneys.

Respectfully submitted,

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